

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF RHODE ISLAND

COOLEY, INCORPORATED,

Plaintiff

vs.

Civil Action No: 17-cv-00084-M-LDA

CARLISLE SYNTEC, INC.; RONALD  
MARK  
ASSOCIATES, INC.; RMA  
TECHNOLOGIES, INC.;  
FLEX MEMBRANE INTERNATIONAL  
CORP.; LESLIE J. SATZ, IN HIS CAPACITY  
AS CHAIRMAN AND PRESIDENT OF  
RONALD MARK ASSOCIATES, INC.;  
MICHAEL SATZ; IN HIS CAPACITY AS  
GENERAL MANAGER OF RMA  
TECHNOLOGIES; III C.; JOHN/JANE DOES  
1-3; DOE CORPORATIONS, 1-3,

Defendants

**OBJECTION TO PLAINTIFF COOLEY, INC.'S MOTION TO COMPEL  
DEFENDANT, CARLISLE SYNTEC, INC.'S RESPONSES  
TO PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS AND,  
TO THE EXTENT NECESSARY, MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Defendant, Carlisle Syntec, Inc., in the above-captioned action hereby submits its Objection to Plaintiff Cooley, Inc.'s Motion to Compel Defendant Carlisle SynTec, Inc.'s Responses to Plaintiff's Second Requests for Production of Documents. Initially, Defendant states that its responses to the Plaintiff's Second Request for Production have been served upon the Plaintiff, indicating that documents responsive to this request will be produced on or before February 16, 2018, and accordingly, the Plaintiff's Motion to Compel in this regard is moot. Defendant notes that the Second Request for Production of

Documents conservatively involves review and potential production of approximately 30,000 documents. On November 29, 2017 counsel for Carlisle wrote to counsel for Plaintiff and advised that Carlisle was in the process of reviewing over 30,000 documents for potential responsiveness to Plaintiff's broad Second Request for Production of Documents. Counsel for Carlisle further advised that it would take some time to review the documents and that hopefully a more realistic schedule for production for that discovery could be discussed during an upcoming Rule 26 conference that was scheduled for November 30, 2017.

During the conference, the parties agreed that the current Case Management Order needed to be revised and that the current fact discovery cut off should be extended to September 10, 2018 and expert discovery to be extended to October 10, 2018. The parties, pursuant to Rule 26, have circulated a revised discovery schedule, which is currently with Plaintiff's counsel for consideration and, subject to Plaintiff's approval, will be submitted to the Court to modify the current Scheduling Order. To the extent an extension of time is necessary to accommodate the February 16 production date indicated in Carlisle's Responses to Plaintiff's Second Request for Production of Documents, Carlisle further moves, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for such an extension of time within which to respond to Plaintiff's Second Requests for Production of Documents. Defendant specifically requests that it have up to and including February 16, 2018 within which to respond to Plaintiff's Second Requests for Production of Documents.

**WHEREFORE,** Plaintiff's Motion should be denied as moot and, in the alternative, Defendant's Motion for an Extension should be granted.

**CERTIFICATION**

Counsel for Carlisle hereby certifies that they conferred in good faith with counsel  
for the Plaintiff prior to the filing of this Motion.

**DICKIE, McCAMEY & CHILCOTE,  
P.C.**

/s/Brett W. Farrar

Frederick W. Bode, III, Esquire

Steven W. Zoffer, Esquire

Brett W. Farrar, Esquire

Douglas M. Grimsley, Esquire

*Attorneys for Defendant, Carlisle Syntec, Inc.*

Defendant, Carlisle Syntec, Inc.

By its Attorneys

/s/Kristina I. Hultman

Kristina I. Hultman (#8275)

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*Attorneys for Defendant, Carlisle Syntec, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of January, 2018, a copy of this document was filed electronically on all counsel of record. Notice of filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/Kristina I. Hultman

Kristina I. Hultman (#8275)